

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of)	
)	
Amendment of Part 97 of the Commission's)	WT Docket No. 05-235
Rules)	
To Implement WRC-03 Regulations)	RM-10781, RM-10782, RM-10783,
Applicable to Requirements for Operator)	RM-10784, RM-10785, RM-10786,
Licenses in the Amateur Radio Service)	RM-10787, RM-10805, RM-10806,
)	RM-10807, RM-10808, RM-10809,
)	RM-10810, RM-10811, RM-10867,
)	RM-10868, RM-10869, RM-10870

Comments of David Witkowski – W6DTW

I would like to commend the Commission for their recent proposal to eliminate telegraphy requirements for licensing in the Amateur Radio service. I have been involved with radio and wireless as a profession for over twenty years, and currently serve on the boards of two 501c(6) non-profit corporations dedicated to developing, promoting and supporting our nation's wireless industries. I recently took the time to test for my Amateur license and passed both Element 2 and Element 3 easily, but for some reason I just don't have an "ear" for telegraphy and as such I'm constrained to the Technician Class. This is unfortunate because current licensing regulations therefore limit my ability to contribute experience and knowledge to the wider Amateur service.

As I interpret the purposes of Amateur service as set forth in Part 97, it's not clear to me how the telegraphy requirement contributes in any substantial way to these goals. The current state of licensing regulation has created a class division within the Amateur service; the "elite" who understand Morse code and the "commoners" who don't. The increasing irrelevance of telegraphy in the face of other technological advances makes this a rather arbitrary and meaningless distinction. Is the true measure of technical prowess the ability to understand what amounts to a language? An analogy to the current telegraphy requirement is a hypothetical university which has set a graduation requirement that in order to obtain a Ph.D. in a technical discipline one must be able to speak Latin, otherwise the highest degree attainable is a Master's or Bachelor's. The requirement contributes nothing to the goal of the degree program which should be focused on certification and accreditation of the graduate's technical proficiencies, not mastery of an ancient language. This is not to say that telegraphy doesn't serve a purpose, rather that it should not be used as one of the definitive criteria which determine qualification for advancement.

The Amateur service would be better served by requiring that applicants for advanced licensing classes demonstrate prowess in use of alphabet phonetics, mitigation of interference sources, interoperability between radios and computing systems, and a host of other skills which currently are not covered by the Element exams. Putting the applicant in a room with a pile of radio equipment and a laptop, and then asking them to set up a PSK communication link to a BBS or peer station would be far more practical than a 5 WPM telegraphy exam.

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